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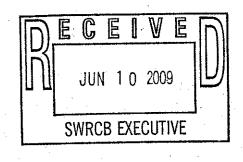
(707) 462-3664

www.mcrcd.org

Ms. Jeanine Townsend, Clerk to the Board State Water Resources Control Board 1001 "I" Street, 24<sup>th</sup> Floor Sacramento, CA 95814

Re: Comment Letter - AARA Subsidy

Dear Ms. Townsend:



Thank you for the opportunity to comment on the clarification of implementation of AARA funds for CWSRF projects. Mendocino County Resource Conservation District has been operating since 1945 to serve landowners in the protection and conservation of working landscapes. A leader in the field of erosion control and best management practices for managing NPS for sediment, MCRCD provides local jobs through restoration and leverages grant dollars to conduct cost-effective projects.

Issue 1. MCRCD recommends Option 1B. Since its inception, the CWSRF has invested a little over \$4 billion on treatment and recycling, and collection systems, roughly 95% of its funding, while allocating only 5% funding for NPS projects. On the North Coast, NPS pollution is the leading contributor to the decline of fisheries and impacts on water quality. Additionally, Mendocino County has a significant portion of the impaired watersheds in the state.

Issue 2. MCRCD recommends Option 2D. The intent of the Economic Stimulus funding is to put people to work. Mendocino County's unemployment statistics are on par with the rest of the state, in addition to being a disadvantaged county. Fewer people are employed to begin with, and of those employed 10.7 percent have lost their jobs. State and local government are the major employers, which have already reduced their work weeks, and the private major employers, the timber and fishing industries, have suffered severe cutbacks in recent years.

MCRCD recommends that projects be funded based upon competitive criteria:

- Completeness of applications;
- Construction and implementation beginning in time frame that meets ARRA requirements;
- Impacts on disadvantaged communities as defined by considering the median income (relative to California median income) and the unemployment rate
- Assessment on the projects' impacts on water quality, beneficial use and anti-degradation criteria

Sincerely,

Janet Olave / limb-Janet Olave, Executive Director